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July 20, 2000

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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Mr. Jamal Mazrui
Common Carrier Bureau
Federal Communications Commission
445 12th St., SW
Room 6-A237
Washington, DC 20554

Re: The Use of N11 Codes and Other Abbreviated Dialing Arrangements
(CC Docket No. 92-105)

Dear Mr. Mazrui:

This letter is in response to your request to the American Public Communications Council (APCC) for information regarding the capability of "smart" payphones to implement 711 dialing for Telecommunications Relay Services (TRS) without requiring a coin deposit. You asked if it is technically feasible for independent PSPs to implement 711 TRS access via smart payphones and whether this implementation would be economically burdensome on independent PSPs. You further asked if 711 could be handled in the same way as 911 is handled.

This letter is being filed during the Sunshine Period in this docket. However, because it is in response to a staff request for information, it is allowed under the Commission's rules governing ex parte contacts.

The APCC is the national trade association for approximately 1,700 independent (*i.e.*, non-telephone company) payphone service providers, operators, suppliers and manufacturers of payphone products and services. Independent payphone service providers (PSPs) range in size from small providers who own and operate just a few payphones to the largest provider, a publicly owned company that operates approximately 70,000 payphones.

Overall, it is estimated that the payphone industry operates 2 million phones nationwide: Independent payphone service providers operate approximately 500,000 payphones nationwide, while incumbent telephone companies, with approximately 1.5 million payphones, still dominate the payphone market.

Traditionally, payphone terminal equipment is connected to one of two types of LEC lines. "Dumb" payphones are connected to central office-controlled payphone lines, also known as smart payphone lines or coin lines. The LEC payphone operations predominantly deploy dumb payphones. Smart payphone terminals are connected to dumb payphone lines, which are traditional business lines with added features such as call

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screening and call blocking. Independent PSPs predominantly deploy smart payphones, which contain computer microprocessors that control the functionality of the payphone.

There are essentially two possible methods for the 711 calls to be routed to the LEC central office switch by smart payphones. In the first method, the payphone would send 711 to the LEC switch and the LEC switch would translate the 711 into the state's TRS access number. This is currently the method used by smart payphones to route 911 calls to the LEC switch. In the second method, the payphone itself would translate 711 to the state's TRS access number and then send the TRS access number to the LEC switch. APCC believes that the first method is more efficient and less burdensome on the independent PSP since the independent PSP would not have to constantly monitor the state's TRS access number to make sure that it is correct and update each smart payphone in its operations.

To respond to your request, APCC polled the four major manufacturers of smart payphones regarding how their terminal sets handle 711 and 911 calls. A summary of their responses is listed in alphabetical order:

Elcotel Telecommunications

911 Calls

The Elcotel set sends the 911 digit string directly to the LEC, after the user dials 911 at the keypad. No special programming is needed. The Elcotel set is preprogrammed at the factory to allow 911 calls.

711 Calls

Programming Elcotel smart payphones to send the 711 digit string directly to the LEC would require an additional download from the Elcotel PNM Plus Management software. The cost would be approximately 1 hour of labor setting up the management software to remotely program the Elcotel set with the 711 TRS access, plus any additional labor time required for field testing. The implementation would be done on the nightly auto-poll by the management software.

Ernest Telecom

911 Calls

Same process as the Elcotel set.

711 Calls

711 cannot currently be dialed from an Ernest payphone. In order to implement this service, new hardware and software would have to be developed. This would require the PSP to change out program chips on the payphone microprocessor board and add a format file to the software. The cost for this would be approximately \$32 per payphone.

Once the PSP upgrades the boards and software, the PSP would be able to program 711 calls either remotely or at the phone. They would also have the option of redirecting the 711 calls to another number (i.e., to the state's TRS access number), or to go straight out as 711.

Intellicall, Inc.

911 Calls

Emergency services calls are typically programmed in the software to be free calls and dialed out as 911. To allow 911 calls, the PSP programs the phone by entering 911 into a call table and assigning the call to be free. This is the "default" configuration provided by Intellicall in its rate tables. The rate tables are programmed at the PC and remotely downloaded into the phone.

711 Calls

Direct dialed 711 calls would be programmed similar to 911. If the 711 call needs to be converted to the direct dial for TRS, an outpulse rule is used which converts the dialed digits (711) into a direct dial number. The outpulse rule is transparent to the end user. It would take about 5 to 10 minutes for a PSP to change a rate table. Programming is done in the PC at the office and the changes downloaded into the phones. The programming of the Intellicall phones does not require a scheduled visit to the phones. Modifications to the programming are done via normal downloading of the phones.

Protel, Inc.

911 Calls

Protel sets can send 911 calls to the payphone line directly as dialed by the user or the user-dialed 911 can be routed to dial a specific access number. By default, 911 calls are enabled in Protel sets. Programming of 911 would be accomplished remotely.

711 Calls

By default, 711 calls are disabled. Therefore, additional efforts must be made to reprogram files to enable 711. Two cost factors that must be considered are (1) reprogramming of files to enable 711 and (2) line charges to transmit the updated files to the phones. The costs would vary from one PSP to another depending upon the number of files to be modified and the costs incurred for phone polling. The programming of 711 calls would be done remotely.

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I hope this is helpful. If you have any further questions, please contact either me or Greg Haledjian of APCC (703-385-5300).

Sincerely yours,

A handwritten signature in black ink, appearing to read 'J. Farber', with a long horizontal flourish extending to the right.

Jacob S. Farber

Attorney for American Public Communications
Council